

Via Facsimile and first-class mail

Country of Origin Labeling Program
Agriculture Marketing Service
USDA Stop 0249
Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Office of Management and Budget
New Executive Office Building
725 17th Street, NW Room 725
Washington, DC 20503

Attention: Desk Officer

Clearance Officer
USDA-OCIO
Room 404-W
Jamie L. Whitten Building, Stop 7602
1400 Independence Avenue, SW
Washington, DC 20250-7602

Sirs:

The Agricultural Marketing Service (AMS) by Federal Register Notice dated November 21, 2002, 67 Fed. Reg. 70205-70206, seeks emergency approval of a new information collection. AMS indicates that its request is to assist in gathering information on country of origin labeling during the "voluntary" labeling program period.

On behalf of the undersigned, we request an extension of time within which to respond to this notice. The request is not made to delay the process. We do not believe anyone will be prejudiced in any manner by the granting this request. In fact, by agreeing to our request, you will allow us time to do the work needed to provide you with more detailed information and therefore with better comments for you to consider. More importantly, we seek an extension because we were not given any notice of this request and we need the additional time to assess the information upon which this request is based.

We believe that the assumptions and the methodologies contained within the Notice may have significant problems. Therefore, we need to know on what documents were the assumptions, facts, and conclusions based. These documents are neither cited nor referred to in this Notice and we believe we are entitled to know the basis of what is being proposed here. To that end, we will be seeking informally and, if necessary, formally, what the information, documents, reports, statistics, studies, etc. upon which the assumptions, information in the Notice is based. Without that information, we will be unable to provide meaningful comments.

Accordingly, we ask that you grant an extension of the comment period for 90 days after the information requested above is provided to us and to the public. Because of the overwhelming public support for origin labeling and its implications for the nation's food industries, a prudent and studied approach to accurately assess the costs is justified.

In view of the foregoing, we respectfully request an extension of time to allow for a thorough and meaningful response on this important issue. If you have any questions, please direct them to John M. Himmelberg, Esq., O'Connor & Hannan, 1666 K. St., N.W., Suite 500, Washington, D.C. 20006, (202) 887-1461.

Sincerely,

Florida Farmers, Inc.
R-CALF United Stockgrowers of America
Organization for Competitive Markets
Livestock Marketing Association
Florida Tomato Exchange
Florida Fruit & Vegetable Association
Florida Farm Bureau